

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

SARAH GENENBACHER, individually and on)	
behalf of all others similarly situated,)	
)	
Plaintiff,)	Case No. 4:25-cv-00084-JAR
v.)	
)	
LEE ENTERPRISES, INCORPORATED,)	
)	
Defendant.)	

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

Plaintiff Sarah Genenbacher and Defendant Lee Enterprises, Inc. (erroneously named as Lee Enterprises, Incorporated d/b/a St. Louis Post Dispatch) (collectively, the “Parties”) stipulate and move the Court for entry of the proposed Stipulated Protective Order, attached hereto. In support of this Motion, the Parties state as follows:

1. The Parties anticipate that discovery in this case may require the disclosure of business, commercial, financial, personal interests, and other sensitive information. The Parties further anticipate that discovery in this case may require the disclosure of non-public information about or relating to third parties and potential witnesses in this case. The Parties agree that entry of the attached Protective Order is necessary to protect the privacy of such information.

2. The Parties request that the Court enter the proposed Stipulated Protective Order, attached to this Motion as **Exhibit A**, which requires the documents produced and discovery otherwise obtained in this case to be used only in connection with the litigation of this case and mandates that each party destroy such documents produced and discovery obtained or return such documents to the producing party upon the completion of this case, including any appeals.

WHEREFORE, for the foregoing reasons, the Parties request that the Court enter the Stipulated Protective Order attached hereto and grant any further relief the Court deems just and proper.

SO STIPULATED AND AGREED:

<p>PARONICH LAW, P.C.</p> <p>By: <u>/s/ Anthony Paronich</u> Anthony Paronich 350 Lincoln Street, Suite 2400 Hingham, MA 02043 (508) 221-1510 anthony@paronichlaw.com</p> <p><i>Attorneys for Plaintiff and Class</i></p>	<p>BRYAN CAVE LEIGHTON PAISNER LLP</p> <p>By: <u>/s/ Darci F. Madden</u> Darci F. Madden, 51463MO 211 N. Broadway, Suite 3600 St. Louis, MO 63102 (314) 259-2000 darci.madden@bclplaw.com</p> <p>Martha Kohlstrand (<i>pro hac vice</i>) Annalisa Kolb (<i>pro hac vice</i>) 1801 13th St. #300 Boulder, CO 80302 (303) 444-5955 martha.kohlstrand@bclplaw.com annalisa.kolb@bclplaw.com</p> <p><i>Attorneys for Defendant Lee Enterprises, Inc.</i></p>
<p>Dated: June 25, 2025</p>	<p>Dated: June 25, 2025</p>

CERTIFICATE OF SERVICE

I hereby certify that on June 25, 2025, a copy of the foregoing was served on all counsel of record by operation of the Court's electronic filing system.

/s/ Darci F. Madden

-